

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: Raul E. Nino	§ § § § §	CASE NO. 12-36519-H2-13 CHAPTER 13
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DEBTOR'S MOTION TO ALLOW NON-CONFORMING § 1328 CERTIFICATION

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Raul E. Nino, Debtor(s), file(s) this Motion to Allow Non-Conforming § 1328 Certification:

1. Debtor filed this bankruptcy on 8/31/2012.
2. Debtor is behind on post-petition homeowner's association dues. Debtor intends to arrange a payment plan to provide for the post-petition obligations.
3. Debtor understands this debt is non-dischargeable and that Debtor is responsible for coming current on all post-petition obligations.
4. Debtor requests that permission to add the following language to the Non-Conforming Motion for Discharge:

"I have not made post-petition payments to my homeowner's association. I

understand that my post-petition obligations are non-dischargeable and are my responsibility. I will contact my homeowner's association to work out a payment plan."

Debtor requests that the Court permit the filing of a non-conforming § 1328 certification containing the additional set forth herein and such further relief the Court finds just.

Respectfully submitted,

KEELING LAW FIRM

/s/Kenneth A. Keeling

Kenneth A. Keeling; TBN 11160500

Yolanda Gutierrez; TBN 24041028

Cristina Rodriguez; TBN 24049980

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3310 Katy Freeway, Suite 200

Houston, Texas 77007

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties by electronic service or by United States First Class Mail on November 2, 2017, as follows:

DEBTOR(S)

Raul E. Nino
2419 Spring Lily Court
Spring, TX 77373

UNITED STATES TRUSTEE

United States Trustee
515 Rusk, Ste. 3516
Houston, TX 77002

CHAPTER 13 TRUSTEE

William E Heitkamp
9821 Katy Freeway Suite 590
Houston, TX 77024

CREDITOR(S)

Ascension Capital Group, Inc. Attn: Capital One Auto Finance, a divisi P.O. Box 201347 Arlington, TX 76006	Curtis W. McCreight Hoover Slovacek LLP Galleria Tower II 5051 Westheimer, Suite 1200 Houston, TX 77056	Department Stores National Bank/Macy's Bankruptcy Processing Po Box 8053 Mason, OH 45040
Dept Of Ed/sallie Mae Po Box 9635 Wilkes Barre, PA 18773	Don Sumners, CPA, RTA Tax Assessor-Collector P.O. Box 4622 Houston, Texas 77210-4622	Enhanced Recovery Corp Attention: Client Services 8014 Bayberry Rd Jacksonville, FL 32256
Fandistg Po Box 22717 Rochester, NY 14692	FBCS Inc 2200 Byberry Rd Ste 120 Hatboro, PA 19040	Mackie Wolf Zientz & Mann, PC 14180 Dallas Pkwy., Ste660 Dallas, TX 75254
Main Street Acquisition Corp., assignee of DELMARVA CAPITAL GROUP, LLC c o Becket and Lee LLP POB 3001 Malvern, PA 19355-0701	Marissa Aranda 7109 Karen St. Houston, TX 77076	Nelnet Attn: Claims PO Box 17460 Denver, CO 80217

Ocwen Loan Servicing, LLC 1661 Worthington Rd., Ste. 100 West Palm Beach, FL 33409	Park Spring HOA, Inc. c/o VanMor Properties, Inc. 8711 Highway 6 North, Ste 270 Houston, TX 77095	Patrick O'Connor & Assoc, LP 2200 North Loop West Suite 200 Houston, TX 77018
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Portfolio Rc Attn: Bankruptcy PO Box 41067 Norfolk, VA 23541	PRA Receivables Management, Receivables Performance LLC POB 41067 Norfolk, VA 23541	20816 44th Ave W Lynnwood, WA 98036
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Sallie Mae Inc. on behalf of Department of Education P.O. Box 740351 Atlanta, GA. 30374-0351	Silverleaf Vacation Cl 1221 Riverbend Dr., Suite 120 Dallas, TX 75247	Slfc/Sallie Mae Attn: Bankruptcy PO Box 9500 Wilkes-Barre, PA 18773
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Spring ISD P.O. Box 4826 Houston, TX 77210	Timber Lane UD PO Box 672346 Houston, TX 77267	United Consumer Financial Services Bass & Associates, P.C. 3936 E. Ft. Lowell Rd, Ste 200 Tucson, AZ 85712
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University Of Phoenix 4025 S Riverpoint Pky Phoenix, AZ 85040	Wells Fargo 1 Home Campus X2303-01A Des Moines, IA 50326	Wfs Financial/Wachovia Dealer Services 10750 Forest St. Suite 200 Rancho Cucamonga, CA 91730
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/s/Kenneth A. Keeling
Kenneth A. Keeling